

REMARKS

Claim Rejections - 35 U.S.C. § 112

The Examiner has rejected claims 1-12 under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Applicant has amended the claims to more particularly point out and distinctly claim the subject matter which the Applicant regards as the invention.

Claim Rejections - 35 U.S.C. § 102 and § 103

The Examiner has rejected claims 1, 2 and 10-12 under 35 USC 102(b) as being anticipated by Endo et al. (U.S. Patent No. 5,645,628). The Examiner has rejected claims 1, 2, 11 and 12 under 35 USC 102(b) as being anticipated by Leever et al. (U.S. Patent No. 4,600,609). The Examiner has rejected claims 3-7 under 35 USC 103(a) as being unpatentable over Endo et al. ('628). The Examiner has rejected claims 3-7 under 35 USC 103(a) as being unpatentable over Leever et al. ('609). The Applicant respectfully traverses. The cited references fail to teach or render obvious all of the elements of the Applicant's claims. In particular, the cited references fail to teach the element of independent claim 1 of "a complexing and buffering agent comprising (NH₂)SO₄." In contrast, Endo teaches the use of two different compounds as the complexing and buffering agents (Abstract lines 6 – 7 and Col. 5 lines 17 – 24 and lines 52 – 60.). In particular, Endo teaches the use of ethylenediamine and derivatives of ethylenediamine as a complexing agent and the use of hypophosphorous acid, hypophosphite, boron hydroxide, hydrazine, or a hydrazine derivative as a reducing agent. Leever also teaches the use of two different compounds as the complexing and buffering agents (Col. 3 lines 42 – 46). In particular, Leever teaches the use of a hypophosphite or dimethylamine borane as reducing agents (Col. 3 lines 55 – 62) and the

use of many complexing agents such as hydroxy acids, amino acids, and pyrophosphates (Col. 3 lines 63 – Col. 4 line 2). Therefore, the Applicant respectfully submits that the cited references, Endo and Leeven, fail to anticipate or render obvious all of the elements of independent claim 1, either individually or in combination. Additionally, because the dependent claims incorporate all of the elements of independent claim 1, it is submitted that the dependent claims are also not anticipated or rendered obvious by the cited references, either individually or in combination.